

Privacy Policy

This is an English translation of the Czech-language original ("Zásady zpracování osobních údajů") provided for informational purposes only. In the event of any discrepancy between this translation and the Czech original, the Czech version shall prevail and is the only legally binding version.

Data controller: Penhouse s.r.o. **Registered office:** Uhřetice 101, 679 63 Uhřetice, Czech Republic
Company ID (IČO): 238 43 683 **Tax ID (DIČ):** CZ23843683 **Registered:** with the Regional Court in Brno, file no. C 147765 **Contact e-mail:** info@chytrochat.cz **Website:** <https://app.chytrochat.cz>

Valid and effective from: 29 July 2026

This Privacy Policy describes what personal data Penhouse s.r.o. (hereinafter "**we**" or the "**Controller**") processes in connection with operating the ChytroChat platform, for what purpose, on what legal basis, to whom it is disclosed, and what rights you have as a data subject. Processing is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter the "**GDPR**") and Act No. 110/2019 Coll., on the Processing of Personal Data.

1. Who this policy concerns

- **Registered users** of the ChytroChat platform (customers who create and operate chatbots with us).
- **Visitors to the website** app.chytrochat.cz.
- **Visitors to chatbots** (end users who communicate with chatbots created by our customers on their websites) — a special regime described in Art. 5 applies here.

2. What data we process and why

2.1. Registered users (customers)

Purpose	Category of data	Legal basis
Creating and administering the user account, providing the Service	name, e-mail address, password (stored in encrypted form)	performance of a contract (Art. 6(1) (b) GDPR)

Purpose	Category of data	Legal basis
Invoicing and compliance with legal obligations	billing details, payment and subscription history	performance of a contract, compliance with a legal obligation (accounting and tax regulations)
Operation and security of the platform	IP address, login and system logs	legitimate interest of the Controller (ensuring security and operation)
Communication with customer support	content of communication, contact details	performance of a contract, legitimate interest
Own API keys for AI models (if inserted by the User)	API key (stored encrypted)	performance of a contract in accordance with the User's instructions

We retain invoicing and accounting records for the period required by law (in particular 10 years under the Accounting Act and the Value Added Tax Act). We retain user account data for the duration of the account and a reasonable period after its cancellation in accordance with the Terms and Conditions, after which we delete it unless the law requires otherwise.

2.2. Visitors to the app.chytrochat.cz website

When visiting the website, we process technical (necessary) cookies and similar technologies used to ensure the functionality of the website and login (e.g. session cookies, CSRF protection). We do not store these technical cookies on the basis of consent, as they are necessary for the website to function (Art. 6(1)(f) GDPR — legitimate interest in the operation of the service).

We do not currently use third-party analytics or marketing cookies on the website. If we deploy them in the future, we will update this Privacy Policy and obtain your prior consent via a cookie banner.

2.3. Registered users as controllers — relationship to their Visitors

If you are a business using ChytrChat to operate your own chatbot, you are yourself the controller of the personal data of your customers and website visitors who communicate with your chatbot. In this relationship, we act as a processor on your instructions — details are set out in Annex No. 1 (Data Processing Agreement) to the ChytrChat Terms and Conditions.

3. Who we disclose data to

We may disclose personal data to the following categories of recipients, always only to the extent necessary for the given purpose:

- **AI model providers** — in particular OpenAI (OpenAI Ireland Ltd. / OpenAI, L.L.C.), to whom queries and relevant conversation content are transmitted for the purpose of generating the chatbot's response, and, where the User chooses to do so, for storing uploaded sources in their vector store (Vector Store).
- **Hosting provider** operating the servers on which the ChytroChat platform runs.
- **Payment gateway provider** processing subscription payments (we do not process or store payment data such as card numbers ourselves — only the payment gateway operator does).
- **External providers of necessary services** (e.g. sending transactional e-mails), where currently used.

We will provide a current overview of sub-processors upon request at our contact e-mail.

4. Transfers to third countries

Some of the recipients listed above (in particular OpenAI) may process data on servers outside the European Economic Area, including the USA. We ensure such transfers on the basis of standard contractual clauses adopted by the European Commission, or on the basis of an adequacy decision (e.g. the EU–U.S. Data Privacy Framework), where the recipient participates in it. You may request a copy of the relevant safeguards at our contact e-mail.

5. Chatbot visitors (widget end users)

If you communicate with a chatbot placed on the website of one of our customers, we process the content of your conversation (and, where you voluntarily provide them via the contact form, your contact details) on behalf of and on the instructions of the operator of that website, who is the controller in relation to your data. We process such data only to the extent necessary for the technical operation of the chatbot (storing the conversation history, generating responses, and, where applicable, evaluating response quality).

If you wish to exercise your rights regarding data provided in such a conversation (access, erasure, etc.), please contact primarily the operator of the website on which you communicated with the chatbot — they are your controller and are obliged to handle your request, and may ask us for assistance if needed.

6. Your rights

As a data subject, you have the following rights under the GDPR:

- the right of **access** to your personal data (Art. 15 GDPR);
- the right to **rectification** of inaccurate data (Art. 16 GDPR);
- the right to **erasure** of data, where the conditions of Art. 17 GDPR are met;
- the right to **restriction of processing** (Art. 18 GDPR);
- the right to **data portability** (Art. 20 GDPR);
- the right to **object** to processing based on legitimate interest (Art. 21 GDPR);
- the right to **lodge a complaint** with the Office for Personal Data Protection (Úřad pro ochranu osobních údajů, www.uoou.cz), if you believe that the processing violates the GDPR.

To exercise these rights, please contact us at info@chytrachat.cz. We will respond to your request without undue delay, and no later than within 1 month of receiving it.

7. Data security

We take appropriate technical and organizational measures to protect personal data, in particular: password encryption (bcrypt), encryption of sensitive data (e.g. API keys) in the database, encrypted data transmission (HTTPS/TLS), restriction of access rights to data to the necessary circle of persons, and encryption of user sessions.

8. Changes to this policy

We may update this Privacy Policy to a reasonable extent, in particular in connection with changes to the data processed, the purposes of processing, or applicable law. The current version is always available on the Provider's website. We will inform registered users by e-mail of any material changes.

9. Contact

If you have any questions regarding the processing of personal data, please contact us at info@chytrachat.cz or in writing at the Controller's registered office address stated in the header of this document.